


May 22, 2007

Ms. Tracie Billington
DWR - IRWM Grant Program
1416 Ninth Street
Mr. Scott Couch, P.G.
SWRCB - Financial Assistance Div.
1001 I Street
Sacramento, CA 95814

Re: Proposition 50, Chapter 8 Integrated Regional Water
Management Implementation Grant Program - Round 2,
Public Review Comments on the Draft Revisions to the
Guidelines and Proposal Solicitation Packages(PSPs).

Dear Ms. Billington, and Mr. Couch:

The following comments are a result of comparing the
information in the Draft Guidelines and PSPs with the April
25, 2007 Public Information Workshop slide presentation
bullet points, and with the May 21, and May 23, 2007 Public
Meetings' slide presentation bullet points, and taking into
consideration other water related matters on the Websites.

- #1 - Since the Draft document did not include a Table
of Contents, it was confusing to make sense of
the referenced Guidelines' Sections. In order
to facilitate "better logic and flow", I had to
put together a Table of Contents. The reader
whether a professional, or general member of
the public must be able to readily find a
particular area of interest. A copy of my
Table of Contents is submitted for your
consideration. Please note that I tried various
format types for hours and this one simplified my
review, and understanding. Please include a
Table of Contents in the final Guidelines and
PSPs document for Round 2.
- #2 - The interactive Draft document feature on the
Website was extremely helpful most of the time,
once I understood the process--which is the

reason why I downloaded and printed the Draft. Please note that sometimes "File Download" would pop up instead of the reader being taken to the clicked specific Draft document section. This is why a Table of Contents is also helpful.

- #3 - The interactive Draft document feature on the Website was frustrating when an Exhibit or Appendix toward the end of the document was clicked and there was no easy way to return to the spot the reader was first focused on. The mouse has to be used to roll back to the spot.
- #4 - Since the DWR and the State Water Board will be distributing information via email in addition to their Websites, then change "Mailing List" on Page 2 to read "E-Mail List".
- #5 - The Draft document, the April 25, 2007 Public Information Workshop slide presentation, and the May 21, and May 23, 2007 Public Meetings' slide presentation state that approximately \$64 million is available for Round 2 proposals funding. About \$21 million may be available for Northern CA, and about \$64.5 million will be awarded to proposals located in Southern CA (Page 5, Draft). This is impossible. The amount available for Southern CA proposals is off.
- #6 - Regions that already received grant awards under Round 1 are eligible to apply for Round 2 if the total funding under Round 1 did not surpass the \$25 million cap. This is unfair to those regions that were not awarded funding, and to other regions that did not apply, or were denied funding due to incomplete applications.
- #7 - While "Disadvantaged Communities" are being included in the regional grant funding program participation process, it is also important that their representatives understand the process, program, and regional proposal(s).
- #8 - "Disadvantaged Communities" must hold public hearings to include the localized citizenry in the regional grant funding program participation process.

- #9 - While "Environmental Justice" is mentioned in the Draft document, and the Public Information Workshop slide presentation, and the Public Meetings' slide presentation, the subject is not included in the text as a bullet point under Section II.E. Program Preference. It is stated, on Page 6, "DWR and the State Water Board will also give preference to proposals that address environmental justice concerns."
- #10 - It is problematic if regions that "only partially overlap the dark shaded areas in Figure 1" are going to be eligible to apply for funding as long as they "make a compelling demonstration that the region has fundamentally different objectives and needs..." under the proposed exception rule. While "Confidentiality" will be waived once the participant's application package is submitted to the agencies (Page 8), it is stated on Page 32, under APPENDIX C.C.5. Attachment 13 Letters of Support or Opposition (If Applicable), "Attachment 13 must be used to submit electronic copies of any letters of support for or opposition to the Proposal or individual projects contained within the Proposal. General letters of support or opposition will not be considered. Letters of support or opposition must clearly state how the implementation of the proposal/project will benefit or adversely impact the individual or entity providing the letter. All letters should be addressed to"

Ms. Shahla Farahnak
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Ms. Tracie Billington
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Already I have opposed the e-mailing of comments on the Draft document rule, and questioned if

State Water Board staff person Couch or Farahnak is to be contacted.

Applicants are asked to provide "General Information". The fourth bullet point under APPENDIX C.C.5. Attachment 6 Scientific and Technical Merit, Page 30, states "Provide copies of the most complete design plans and specifications for the proposed project(s)."

It is stated, on Page 9, under Guidelines Section IV.I. Waiver of Litigation Rights "Grant agreements funded by the State Water Board will specify that under no circumstances may a Grantee use funds from any disbursement under the grant agreement to pay costs associated with any litigation the Grantee pursues against the State Water Board or any Regional Water Board, regardless of the outcome of any such litigation, and notwithstanding any conflicting language in the grant agreement, the Grantee agrees to complete the Project funded by the grant agreement or to repay the grant funds plus interest." The NFIP is already in shambles, FEMA is in chaos, and floodplain management projects fail because general comments--unlike letters that are technically and scientifically savvy--are not considered.

Applicants who circumvent and violate the public participation process by not responding in kind to letters submitted in "good faith" for public review proposals/plans must be weeded out from the IRWMGP funding process.

- #11 - The final Guidelines and PSPs document must include more information on "donated services from non-state sources", and "state services" (Page 6, Section II.D. Minimum Funding Match Requirements). The DWR and State Water Board Websites should also have information on this.
- #12 - The Draft document takes hours to print!!! Please have a note to this effect. For the business time is money. For the general public time is taken away from printing other documents in a timely manner.

- #13 - Capitalize all of the TABLES and their Titles. It is stated on Page 4 "To foster understanding and clarity DWR and the State Water Board will use the following terms consistently in these guidelines..."(Guidelines II.A. Usage of Terms). The same rule must apply to the TABLES.
- #14 - The size of the Draft document's wording(text) is extremely small. Strains the eyes of readers who wear glasses, and/or contact lenses especially.
- #15 - The text about DWR reviews of 2005 UWMPs must not be deleted.
- #16 - Reevaluation of the Plan must not be eliminated with regards to APPENDIX C Step 2 PSP.
- #17 - The May 21, and May 23, 2007 Public Meetings slide presentation's "Additional Changes to Draft" information should have been noted in an Addendum, or Supplemental on the DWR's and State Water Board's Websites.
- #18 - Detailed Census Guidance must not be deleted.

SUGGESTION

- 1. Title FIGURE 1, on Page 5, "Geographic Implementation Grant Funding Distribution Map".

ERRORS

- #1 - Page 3, change the subject "ACRONYMS AND ABBREVIATIONS USED IN THESE GUIDELINES AND APPENDICES" to read "ACRONYMS AND ABBREVIATIONS USED..."
- #2 - Page 17, the paragraph encouraging applicants to review the FFAST User Manual, the sentence "In necessary, DWR and the State Water Board may make minor technical and administrative changes..." should read "If necessary..."
- #3 - The TABLES begin with TABLE 3. TABLE 1 and TABLE 2 are missing, or TABLE 3 is not numbered

correctly(Page 13, or refer to copy of Jordan TABLE OF CONTENTS). This is confusing because it is stated on Page 42, under ROW(I) Grand Total(Sum Rows(A) through (H) for each column) --EXHIBIT 2 BUDGET--"From this summary sheet use the grand total from the 'Non-state Share (Funding Match)' column, and use this cost to include in Table 1 - FFAST Checklist, under the box entitled 'Local Cost Match'".

- #4 - The Roman numeral for Guidelines Section IV. Schedule is incorrect. Change to "VI"(Page 13).

QUESTIONS

1. Why were the "New Appendix B", "FFAST Attachment Instructions", and "Detailed FFAST instructions available online" bullet points from the April 25, 2007 Public Workshop deleted for the May 21, and May 23, 2007 Public Meetings? Has Appendix B been deleted altogether?

Page 17, of the Draft document, states "Applicants must submit a complete application on-line using the State Water Board Financial Assistance Application Submittal Tool(FFAST)."--APPENDIX B. Also, Page 18, APPENDIX C.C.1 PSP for Step 1. TABLE C-1 - STEP 1 CHECKLIST states under "2." "If this item is not completed FFAST will not accept the application."

2. Does DWR, and/or the State Water Board have a list of the "Disadvantaged Communities" throughout California?
3. Why are "donated services from non-state sources" being considered for the funding match(Page 6)?
4. Are "donated services from non-state sources" cash related, or volunteer related?
5. If "donated services from non-state sources", and even "state services" are going to be considered, how is a monetary value put on non-cash type salaried hours?

6. If Northern California has met the 40% funding requirement, and Southern California meets the 40% funding requirement of the available grant awards(=80%), where does the remaining 20%(+80%=100%) end up? Are there set requirements somewhere for the remaining 20%? Or, why are the percentages not adding up to 100%?
7. Why was NEPA not included under Guidelines Section IV.E. CEQA Compliance, on Page 9--it was joined with CEQA under Guidelines V.J. Grant Agreement on Page 12, and under EXHIBIT 1 WORK PLAN(Page 38)?
8. If "Statewide Priorities" were removed from the Guidelines, Selection Panel Factors, and the Scoring Criteria, why are these significant words still included under APPENDIX A - IRWM PLAN STANDARDS "L" on Page 15?
9. What is the DWR and the State Water Board doing to reach the visually impaired citizenry to get this disabled population involved in the IRWMGP process?
10. Why was the "One contract per region" April 25, 2007 Public Information Workshop slide presentation bullet point deleted from the May 21, and May 23, 2007 Public Meeting slide presentation?
11. Did "GW" Comprehensive Monitoring refer to groundwater in the April 25, 2007 Public Information Workshop slide presentation--Past Awards/Expenditures(3 slides)?
12. Since Draft IRWM Plans are being limited, is the publicly noticed review & comment period(Workshop) referring to the "General Letters" in support or opposition that will not be considered? Is the public notice being limited? Is the public review and comment period being limited?

Sincerely,

Mrs. Teresa Jordan